

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:	)	Case No. 09-46513-705
	)	Chapter 7
TIMOTHY GERALD PACE	)	
KAREN RENEE PACE,	)	<b><u>MOTION FOR EXTENSION OF</u></b>
	)	<b><u>DEADLINE FOR OBJECTING TO</u></b>
Debtors.	)	<b><u>DISCHARGE OR DISCHARGEABILITY</u></b>
	)	

COMES NOW Van P. Steed, by and through counsel, and for his Motion For Extension of the Deadline for Objecting to Discharge or Dischargeability, states:

1. Debtors filed their Voluntary Chapter 7 Petition in this Court on July 8, 2009.
2. Debtors appeared for their Section 341 Meeting of Creditors on July 31, 2009.
3. The current deadline, as previously extended by the court, for objecting to discharge or dischargeability is April 1, 2010.
4. Van P. Steed ("Creditor") previously had counsel in this case, but said counsel has withdrawn, leaving Creditor unrepresented.
5. Creditor just contacted the undersigned about 48 hours ago. The undersigned requires an additional extension of time during which he can become acquainted with the facts and people involved in this matter, which involves several other people and businesses in bankruptcy around the country.
6. Creditor requests an extension of the current deadline by approximately three weeks, up to and including April 26, 2010,.
7. This extension is not sought for the purposes of delay. Creditor is well aware of the several previous extensions which have been granted. However, the undersigned require additional time to evaluate the available information, obtain additional information, if

appropriate, and advise Creditor whether further action would be appropriate.

8. The undersigned has contacted Debtors' counsel to request Debtors' consent to this request. As of the time of filing, counsel has been unable to reach the Debtors for instruction.

9. This Motion may be considered without hearing pursuant to Local Bankruptcy Rule 9062-1.

WHEREFORE, Creditor prays for an Order of this Court extending the deadline for all parties in interest to file complaints objecting either to the grant of a discharge to the Debtor or to the dischargeability of particular debts, together with such further relief as the Court may deem proper.

Dated: April 1, 2010

DANNA MCKITRICK, PC

By: /s/ A. Thomas DeWoskin  
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ATTORNEYS FOR CREDITOR

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing was served by U. S. Mail, first class postage prepaid, on each of the following not being served electronically, on April 1, 2010

Timothy & Karen Pace  
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/s/ A. Thomas DeWoskin